

- b. Plaintiffs are employees covered and governed under the provisions of the Act.
- c. Plaintiffs performed job duties for the defendants as employees for which they were not exempt from the overtime requirements of the Act.
- d. Defendants wilfully failed and refused to pay overtime wages to plaintiffs to in violation of the Act.
- e. Defendants are jointly and severally liable to pay overtime wages and liquidated damages to Plaintiffs respectively in the principal amount as follows::

Toni L. Miller	\$387,068.30
Susan Elliott	\$158,178.14
Ariel Kleinsmith	\$34,560.00

- f. Defendants' violation of the Act was knowing and willful, giving rise to liability to plaintiffs for the payment of liquidated damages and the application of the 3 year statute of limitation.

(2) Appendix. This motion is supported by an Appendix submitted under LR 56.5 of this Court filed and served concurrently herewith.

WHEREFORE, plaintiffs hereby request that this court issue an order to grant summary judgment in their favor and against defendants, and order defendants overtime wages as required under the Act, and together with liquidated damages, pre- and post-judgment interest, costs and

attorney's fees as provided under the Act, and together with all other relief the Court deems just and appropriate under the circumstances.

DATED this 14th day of March, 2014.

JAMES MOULTON, ATTORNEY AT LAW

By: James B. Moulton

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I certify one true and correct copy of the foregoing instrument was served on Defendants' lead counsel of record by electronic mail through the Court's EFCM system on this 14th day of March, 2014.

By: /S/ James B. Moulton

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